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ORIGINAL

July 30, 1999

Memorandum of Ex Parte Communication

Ms. Magalie Salas Secretary Federal Communications Commission 445 12th Street, S. W. Street Lobby – TW A235 Washington, D.C. 20554

Dear Ms. Salas:

Re: CC Docket No. 98-141

On July 29, 1999, SBC provided the attached material regarding Lifeline service in the Southwestern Bell Telephone, Pacific Bell, Nevada Bell and Southern New England Telephone service areas to Mr. Mark Nadel in response to his request. Please stamp and return the provided copy to confirm your receipt. Please contact me at (202) 326-8889 should you have any questions.

Sincerely,

Attachment

Cc: M. Nadel (w/o attachment)

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STATE

ARKANSAS

ELIGIBLITY CRITERIA

May qualify by satisfying:

1.

- eligible for Food Stamps
- eligible for Medicaid, including Supplemental Security Income
- eligible for AFDC...or

2. Annual household income at or below 100% of Federal Poverty level for a household of 4

STATE

ELIGIBLITY CRITERIA

CALIFORNIA

 Household income by size of household; updated every May; capped at 150% of federal poverty level

STATE

ELIGIBLITY CRITERIA

CONNECTICUT

Eligible for receiving low income or energy assistance under program administered by Connecticut Dept. of Income Maint. And HR:

- Aid to Families with Dependent Children
- Title 19-Medicaid
- State Supplement to the Aged, Blind or Disabled
- Food Stamp Program
- Energy Assistance Program
- Connecticut Energy Assistance Program
- State Appropriated Duel Assistance Program
- Child Care Certification
- Transition Child Care
- Personal Care Assistance Program
- Rental Assistance Program
- Section 8 Housing
- ConnPACE
- Supplemental Security Income
- Refugee Program
- State Administered General Assistance Program

STATE

ELIGIBLITY CRITERIA

KANSAS

Proof of participation in:

- Temporary Assistance to Families
- Food Stamps
- General Assistance
- Supplemental Security Income
- Food Distribution Program
- Medicaid

STATE

ELIGIBLITY CRITERIA

MISSOURI

Proof of participation in:

- Medicaid
- Food Stamps
- Supplemental Security Income
- Federal Public Housing Assistance (Sec. 8)
- Low Income Energy Assistance
- Income qualified as found in Missouri State Statute 660.105

STATE

ELIGIBLITY CRITERIA

NEVADA

 automatic eligibility if in Nevada Dept. of Human Resources data banks (income of 150% of federal poverty rates)

STATE

ELIGIBLITY CRITERIA

OKLAHOMA

eligible for:

- Temporary Assistance to Needy Families
- Food Stamps
- Medical Assistance
- Supplemental Security Income
- Vocational Rehabilitation Program
- Certified by Oklahoma Tax Commission

STATE

ELIGIBLITY CRITERIA

TEXAS

provided:

1. household income at or below poverty level (as determined by U.S. O.M.B.)

Or

- 2. participate in:
 - Medicaid
 - Supplemental Security Income
 - Food Stamps
 - Federal Public Housing Assistance
 - Low Income Home Energy Assistance

CONDITIONS

Certification	•
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Arkansas

- 1.) program participation certified by Arkansas Department of Human Services
- 2.) income eligibility proven by customer providing photocopy of W-2, 3 paycheck stubs, or letter from employer

California

self-certification via signed form

Connecticut

certified card or letter from agency and application form showing that customer meets state established income test and not a dependent for Federal Income Tax purposes, unless over the age of 60

Kansas

verification of customer's participation in a qualifying program

Missouri

signed document proving certification by Dept. of Social Services

Nevada

automatic by inclusion in Nevada Dept. of Human Resources data banks

Oklahoma

proof of participation in a qualifying program and not a dependent for Federal Income Tax purposes, unless over the age of 60

Texas

income certified by a copy of most recent U.S. tax return or documentation (e.g. valid ID card) verifying participation in a qualifying program

CONDITIONS

Other:	Deposit	Recertify	Optional <u>Services</u>
Arkansas	None, with Toll Restriction	Annually	All *
California	None, with Toll Restriction	Annually	All
Connecticut	not yet available	Periodic verification	Not yet available
Kansas	Normal standards	Annually	All
Missouri	None, with Toll Blocking	Annually	All
Nevada	None	When qualifying criteria changes	All
Oklahoma	None, with Toll Blocking	Annually	All
Texas	Normal standards	Annually	All

"All means that ventical features can be taken at stal. tariffe rates without affecting lifeline eligibility."

LIFELINE COMPARISON SBC

The rate comparisons are for single line, residence flat-rate Lifeline service, except for Arkansas which only has a mandatory measured service available to Lifeline customers. The urban and rural prices are calculated from the lowest and highest rate groups. The rates are exclusive of other charges, such as surcharges, taxes, etc., since these are likely to vary considerably.

Here follows the analysis:

STATE	PRESENT DISCOUNT	LIFELINE RATES		STANDARD RATES	
D41112		URBAN	RURAL	URBAN	RURAL
	710 04	.		* 10.01	M16.61
Arkansas	\$10.95 - \$13.80	\$ 6.01	\$ 4.66	\$19.81	\$15.61
California	\$ 9.13 - \$12.28	\$ 5.62	\$ 5.62	\$17.90	\$14.75
Connecticut	\$ 7.00	\$11.03	\$ 7.03	\$18.03	\$14.03
Kansas	\$10.50	\$ 6.00	\$ 1.95	\$16.50	\$12.45
Missouri	\$ 7.00	\$ 9.00	\$ 4.05	\$16.00	\$11.05
Nevada	\$ 8.55	\$ 5.70	\$ 5.70	\$14.25	\$14.25
Oklahoma	\$ 7.00	\$10.22	\$ 6.72	\$17.22	\$13.72
Texas	\$10.50	\$ 4.05	\$ 2.50*	\$14.55	\$11.65
ОНІО	\$10.20	\$ 7.70	\$ 7.70	\$17.90	\$17.90

It should be noted that all of the SBC states, except Kansas, have measured service options, which may be less expensive for Lifeline customers. Ohio has several measured service options.

^{*}Minimum rate for Lifeline.

		DISCOUNTS (Per ma)		
STATE	SUBSCRIBERS	CURRENT	OHIO PLAN (\$10.20)	
Ark	8,867	S97,094	\$90 , 443	
Cal	3,105,000	28,348,650	31,671,000	
Coun	59,547	416,829	607,379	
Kan	4,258	44,709	43,432	
Mo	7,885	55,195	80,427	
Nev	9,434	80,661	96,227	
Okla	521	3,647	5,314	
Tex	210,686	2,212,203	2,148,997	

^{**}Worst case comparison assuming that all present Lifeline subscribers receive the minimum, present discount and that all convert to a \$10.20 discount, allowed as a maximum under the merger agreement.